

Exhibit A



Holme Roberts & Owen LLP
Attorneys at Law

COLORADO SPRINGS

VIA EMAIL

May 4, 2007

BOULDER

Maurice M. Suh, Esq.
Gibson, Dunn & Crutcher
333 South Grand Avenue
Los Angeles, CA 90071

DENVER

Re: *USADA and Floyd Landis,*
AAA No. 30 190 00847 06

Dear Mr. Suh:

LONDON

This correspondence constitutes the Second Request of the United States Anti-Doping Agency ("USADA") for Production of Documents from Floyd Landis, and supersedes USADA's First Request of April 3, 2007, which, although never objected to by Respondent, has been rendered moot by additional developments.

LOS ANGELES

As indicated in the Request of April 3, 2007, the broad nature of those Requests was made necessary because of your refusal to identify the nature of Respondent's defenses, and particularly, to confirm whether or not he intended to maintain the myriad of claimed medical conditions to which he originally attributed his adverse analytical finding.

MUNICH

On April 27, 2007, USADA received Respondent's Pre-Trial Brief. Accordingly, it is now confirmed that Respondent has abandoned all of his medical defenses and will not be putting his medical condition at issue in this proceeding. As such, please find below USADA's Requests, which have been narrowed in recognition of his decision to abandon any medical explanation for his adverse analytical finding.

SALT LAKE CITY

SAN FRANCISCO

As you know, the start of the hearing is rapidly approaching. In light of the delay caused by Respondent's failure to provide documents without availing himself of the arbitration process by objecting to USADA's First Request or by raising an objection with the Panel, USADA has further narrowed this Request. However, despite this narrowing, USADA reserves the right to examine Respondent at the hearing regarding, among other things, any of the subjects contained in USADA's First Request. For example, USADA is entitled to

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examine Respondent regarding any issue that impacts the credibility of his testimony before the Panel. This includes but is not limited to, any motivation he may have to cover up his own doping activity for any reason. Similarly, USADA reserves the right to examine Mr. Landis regarding statements he has made about this case to anyone, whether it be the media, his press consultants, website or any other person, where the content or purpose of such statements may assist the Panel in determining the weight that should be afforded to Respondent's testimony.

USADA does not believe it is necessary to import instructions for this discovery response from the civil litigation model and instead simply requests that you make a good-faith effort to provide all responsive documents to each request below that are in the possession of Mr. Landis or any agent of Mr. Landis or can be obtained through reasonable means by Mr. Landis. If you have any questions regarding any of the specific requests set forth below, please do not hesitate to contact me. Further, while USADA is not serving interrogatories, if it would be easier for Mr. Landis to answer any of the discovery requests below by providing a narrative response in addition to or, under appropriate circumstances, in place of providing certain documents, USADA is willing to review such a response and discuss with you whether it is sufficiently responsive under the circumstances. Additionally, please indicate in your response any category of documents where there are no responsive documents.

DOCUMENT REQUESTS:

1. Provide copies of all documents related to summaries of blood and/or urine tests received by Mr. Landis or any agent of Mr. Landis from Union Cycliste Internationale ("UCI"), Phonak, or any other source, without limitation as to time period regarding results of testing performed on Mr. Landis. Specifically, without limiting the scope of this Request, upon information and belief USADA is aware that UCI recently provided Mr. Landis with a summary of his blood tests and USADA believes that this summary would indicate a pattern and profile that is consistent with doping.

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2. Provide copies of all documents and correspondence exchanged between Floyd Landis, or any agent or representative of Floyd Landis, and Agence française de lutte contre le dopage (AFLD) or Conseil de prévention et de lutte contre le dopage (CPLD), its predecessor agency, related in any way to the subject matter of these proceedings, including but not limited to the documents that we understand were delivered to counsel for Respondent by AFLD earlier today, regarding the results of an independent review of LNDD's analysis of Mr. Landis's Stage 17 sample and related issues.
3. Provide copies of all documents and correspondence exchanged between Floyd Landis, or any agent or representative of Floyd Landis, and UCI regarding any issue related in any way to the subject matter of this proceeding.
4. Provide copies of all documents related to Floyd Landis' efforts related to the anti-doping movement prior to July 20, 2006, including, but not limited to any comments submitted by Floyd Landis to anyone regarding the USADA Protocol, the World Anti-Doping Code (the "World Code"), the World Anti-Doping Agency ("WADA") Prohibited List and any correspondence between Floyd Landis and the United States Olympic Committee ("USOC") or the Athlete Advisory Council ("AAC") regarding Mr. Landis' opinions and or concerns regarding doping in the sport of cycling or the anti-doping adjudication or testing system. If no such documents exist, simply state that there are no responsive documents.
5. Provide a complete hard copy of the documents produced to Floyd Landis by AFLD, previously sent via PDF on February 21, 2007. These files were previously requested on April 3, 2007, and Mr. Jacobs indicated that it would not be a problem to provide them. However, we have not received the files as promised.

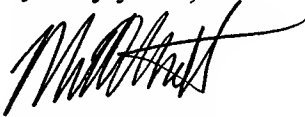
If you have any questions regarding these Requests please do not hesitate to contact me. Given your failure to respond to either USADA or the Panel with respect to USADA's First Requests, you have now significantly delayed the production of these relevant documents. In light of this delay and the fact that USADA has made every effort to narrow these Requests in accordance with the

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tight timeline now faced by both Parties, we hereby request production of the Requested documents as soon as possible, but not later than May 8, 2007.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Matthew S. Barnett', with a stylized, cursive script.

Matthew S. Barnett

cc: Howard Jacobs, Esq.